

EXHIBIT G

STATE OF NEW YORK: COURT OF CLAIMS

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CHAD STANBRO,

Claimant,

-against-

THE STATE OF NEW YORK,

Respondent.

-----X

NOTICE OF INTENTION
TO FILE CLAIM

18-030164

2018 SEP 26 PM 3:35

RECEIVED

SEP 27 2018

Claims Bureau - NYC

TO: ATTORNEY GENERAL OF THE STATE OF NEW YORK

PLEASE TAKE NOTICE that the claimant hereby gives notification of his intention to file a claim against the State of New York pursuant to sections 10 and 11 of the Court of Claims Act, as follows:

DOCCS
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1. Claimant currently resides at Mohawk/Walsh Correctional Facility, 6100 School Road, Rome, NY 13440.
2. This is a claim to recover damages for personal injuries to claimant resulting from the negligence, recklessness, medical malpractice, and intentional conduct of the State of New York, its agents, servants and/or employees, in their care, custody, supervision, and treatment of claimant.
3. This Notice of Intention to File Claim is being served and filed with the Attorney General of the State of New York within ninety (90) days of the accrual of the causes of action herein.
4. The claim arose on or about August 31, 2018 at approximately 12:00 noon in the Dental Building of Westchester Medical Center, 100 Woods Road, Valhalla, NY 10595. At the aforesaid time and place, claimant was in the custody of officers of the Department of Corrections and Community Supervision (DOCCS) undergoing a dental/medical procedure, when he had an adverse reaction to anesthesia. In response to that reaction, the DOCCS officers brutally restrained,


assaulted, and battered claimant, causing claimant to sustain severe personal injuries. Thereafter, the officers forcibly removed claimant from the Medical Center, contrary to all medical indications, and brought claimant to Fishkill Correctional Facility where they denied him medical attention and continued to assault and batter him and verbally ridiculed him, including accusing claimant of faking his injuries. Once at Fishkill, claimant was denied medical care and was given improper medical care and treatment, and was subjected to medical malpractice. As a result of the actions of the State and DOCCS, claimant sustained multiple injuries, including quadriplegia.

5. It is alleged that the officers in question were negligent and reckless in their supervision and treatment of claimant, and that they assaulted, battered, and used excessive force against claimant. It also is alleged that staff at Fishkill committed medical malpractice in their care and treatment of claimant. It also is alleged that the State of New York is vicariously liable for the aforesaid actions of the corrections officers and staff under the doctrine of respondeat superior. It also is alleged that the State of New York was negligent and reckless in its hiring, training, supervision, and retention of these corrections officers and staff, and in its supervision and control of inmates, corrections officers, and staff employed by DOCCS.

6. As a result of the aforesaid incident, claimant suffered physical and psychological injuries, incurred and will incur medical and healthcare costs and other economic loss, and endured and will continue to endure conscious pain and suffering and loss of enjoyment of life, all to his damage in the amount of Fifty Million (\$50,000,000) Dollars.

Dated: New York, New York
September 28, 2018

SIVIN & MILLER, LLP

By 
Edward Sivin
Attorneys for Claimant
20 Vesey St., Suite 1400
New York, NY 10007
(212) 349-0300

VERIFICATION

EDWARD SIVIN, an attorney duly admitted to practice law in the State of New York, hereby affirms the following, under penalty of perjury:

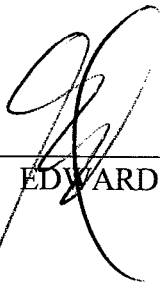
That I am the attorney for the claimant in the within matter.

That I have read the foregoing Notice of Intention to Make Claim and know the contents thereof; that the same is true to my own knowledge, except as to the matters therein stated to be upon information and belief; and as to those matters I believe it to be true.

That the reason this verification is made by your affirmant and not by the claimant is that claimant is not in the County where your affirmant maintains his office.

That the grounds for your affirmant's belief as to all matters not stated upon my knowledge are as follows: records, reports, facts and documents contained in claimant's file maintained by your affirmant's office.

Dated: New York, New York
September 26, 2018



EDWARD SIVIN

STATE OF NEW YORK: COURT OF CLAIMS

CHAD STANBRO,

Claimant,

-against-

THE STATE OF NEW YORK,

Respondent.

NOTICE OF INTENTION TO MAKE CLAIM

SIVIN & MILLER, LLP

Attorneys for Claimant

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